

REMARKS

Claims 3-8, 11-101 are pending, of which claims 50, 54, 68, 71, 80, 85, and 99 are independent. Claims 1-2 and 9-10 have been cancelled by this amendment without waiver or prejudice. Claims 3, 5-8, 11, 12, 13, 28, 30, 50, 54, 68, 71, 80, and 85 have been amended, and claims 99-101 have been added by this amendment. No new matter has been added.

Claims 1-12, 23, and 54-70 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Publication 2004/0046736 to Pryor (Pryor). Claims 13-22 and 24-53 are rejected under 35 U.S.C. 103(a) as being unpatentable over Pryor in view of U.S. Patent No. 6,661,918 to Gordon (Gordon) and/or U.S. Patent No. 6,125,198 to Onda (Onda). Claims 71-91 and 96-98 are rejected under 35 U.S.C. 103(a) as being unpatentable over Pryor in view of U.S. Publication 2001/0033675 to Maurer et al. (Maurer). With respect to cancelled claims 1-2 and 9-10, these rejections are rendered moot.

Claims 92-95 are objected to as being dependent upon a rejected base claim, but would be allowable if re-written in independent form. Applicant thanks the Examiner for the indication of allowable subject matter in claims 92-95.

Regarding the rejections of independent claims 50, 54, 68, 71, 80, and 85, Applicant respectfully submits that Pryor, Gordon, Onda, and Maurer, either alone or in combination, do not disclose or fairly suggest all of the limitations of the independent claims, including new independent claim 99. More particularly, the art of record does not disclose or fairly suggest the limitation of "generating a scene description that includes an indication of ... a feature included in a scene" (claim 99; see also claims 50, 54, 68, 71, 80, and 85 having similar recitations). Moreover, the art of record fails to describe or fairly suggest the limitation of "detect[ing] an object as a cluster of features within the scene description" (claim 68, see also claims 50, 54, 71, 80, and 85 having similar recitations).

The limitation of generating a scene description that includes an indication of a feature included in a scene that is included in independent claims 50, 54, 68, 71, 80, 85 and 99 is similar to the limitations recited in cancelled claims 9 and 10. Cancelled claims 9 and 10 were rejected

under U.S.C. 102(e) as being anticipated by Pryor. Consequently, the Office Action indicates that Gordon, Onda, and Maurer are not relevant to the feature of generating a scene description that includes an indication of a feature included in a scene. Instead, the Office Action relies solely on Pryor to describe or suggest such a feature.

Pryor describes identifying locations of objects within images through identification of targets mounted on the objects. More particularly, Pryor describes recognizing the targets from the images based on the color of the targets (Pryor, paragraphs 170-173).

Therefore, Pryor does not describe or suggest generating a scene description that includes an indication of a feature included in a scene, as recited in claims 50, 54, 68, 71, 80, 85 and 99. Consequently, Pryor does not describe or suggest detecting an object as a cluster of features within the scene description, as recited in claims 50, 54, 68, 71, 80, and 85.

Therefore, Pryor, Gordon, Onda, and Maurer, either alone or in combination, fail to describe or suggest all of the features of independent claims 50, 54, 68, 71, 80, 85, and 99. More particularly, Pryor, Gordon, Onda, and Maurer fail to describe or suggest generating a scene description that includes an indication of a feature included in a scene, as recited in the independent claims. Moreover, Pryor, Gordon, Onda, and Maurer fail to describe or suggest detecting an object as a cluster of features within the scene description, as recited in the independent claims.

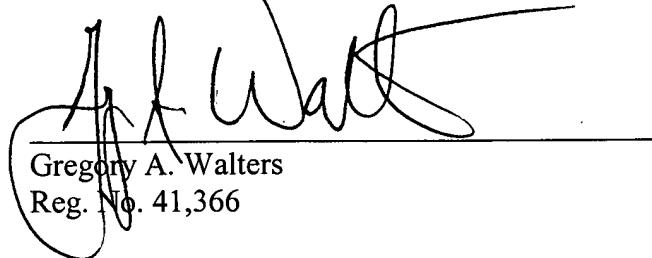
For at least these reasons, Applicant submits that independent claims 50, 54, 68, 71, 80, 85, and 99, and their respective dependent claims 3-8, 11-49, 51-53, 55-67, 69-70, 72-79, 81-84, 86-101, are allowable over the art of record. Therefore, all claims are believed to be in condition for allowance, and such action is hereby requested in the Examiner's next official communication.

Enclosed is a check for \$620.00 (\$395.00 for the Request for Continued Examination fee and \$225.00 for the Petition for Extension of Time fee, extending the time for response by two months from August 4, 2005 to October 4, 2005). During prosecution of this application, please apply any other charges or credits to deposit account 06 1050.

Applicant : Evan HILDRETH et al.
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Page : 23 of 23

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Respectfully submitted,



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